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April 21, 2005

Hon. James H. Welsh Commissioner of Conservation Office of Conservation Post Office Box 94275 Baton Rouge, Louisiana 70804-4275

Re:

17,900' Tuscaloosa Zone, Reservoir A 19,000' Tuscaloosa Zone, Reservoir I

Morganza Field, Pointe Coupee Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **BP AMERICA PRODUCTION COMPANY** for the calling of public hearings, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the 17,900' Tuscaloosa Zone, Reservoir A, and the 19,000' Tuscaloosa Zone, Reservoir I, all in the Morganza Field, in Pointe Coupee Parish, Louisiana:

17,900' Tuscaloosa Zone, Reservoir A

- 1. To create three (3) additional drilling and production units for the exploration for and production of gas and condensate for the 17,900' Tuscaloosa Zone, Reservoir A, in Morganza Field, in Pointe Coupee Parish, Louisiana, said units to be designated 17900 TUSC RA SUHH, 17900 TUSC RA SUII and 17900 TUSC RA SUJJ, all as shown on the plat attached hereto and made a part hereof.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units, with each separate tract sharing in unit production on a surface acre basis of participation.

- 3. To amend the spacing provisions of Office of Conservation Order No. 1102, effective October 20, 1980, to allow the original unit well in each of the proposed units to be drilled at a location no closer than 330 feet from any unit boundary line, in exception to the spacing provisions of Office of Conservation Order No. 1102, effective October 20, 1980.
- 4. Except to the extent herein contrary, to extend to the proposed additional units all pertinent provisions of Office of Conservation Order No. 1102, effective October 20, 1980, as amended and supplemented by the 1102-A Series of Orders, and all applicable Statewide Orders.
- 5. To consider such other matters as may be pertinent.

The 17,900' Tuscaloosa Zone, Reservoir A, in the Morganza Field, Pointe Coupee Parish, Louisiana, was previously defined in Office of Conservation Order No. 1102, effective October 20, 1980, and was redefined in Office of Conservation Order No. 1102-A-10, effective September 19, 1995, and again redefined in Office of Conservation Order No. 1102-A-18, effective January 29, 2002.

19,000' Tuscaloosa Zone, Reservoir I

- 1. To establish rules and regulations and to create two (2) drilling and production units for the exploration for and production of gas and condensate from the 19,000' Tuscaloosa Zone, Reservoir I, in the Morganza Field, Pointe Coupee Parish, Louisiana, such units to be designated 19000 TUSC RI SUA and 19000 TUSC RI SUB, all as shown on the plat attached hereto and made a part hereof.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units with each tract sharing in unit production on a surface acreage basis of participation.
- 3. To provide that any future wells drilled to the 19,000' Tuscaloosa Zone, Reservoir I, in the Morganza Field, within or outside of the proposed units, should be located in accordance with the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
- 4. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoir by supplemental order without the necessity of a public hearing should the producing characteristics of such reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
 - 5. To consider such others matters as may be pertinent.

The 19,000' Tuscaloosa Sand, in the Morganza Field, Pointe Coupee Parish, Louisiana, previously defined in Office of Conservation Order No. 1102-B, effective September 19, 1995, and was redefined in Office of Conservation Order No. 1102-B-7, effective June 4, 2002.

Pertinent data relating to the applicant's proposals can be obtained, <u>AT THE</u> <u>COST OF THE REQUESTING PARTY</u>, from W. H. Robbins & Associates, LLC, 302 LaRue France, Lafayette, Louisiana, 70508, Telephone Number 337/232-5004.

Pursuant to the Rules of Procedure, pre-application notice was given. No request for the conference was received; therefore, the conference tentatively scheduled for April 28, 2005, WILL NOT BE HELD.

Attached hereto and made a part hereof are plats outlining the applicant's proposals along with a list of the names and addresses of the Interested Owners, Represented Parties and Interested Parties to whom a copy of this application is being sent. Pursuant to the Revised Rules of Procedure, such plats (being the same plats attached to the pre-application notice dated April 7, 2005) and list of parties are being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be provided to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

Finally, enclosed is our check on behalf of the applicant, in the amount of \$1,510.00 made payable to the Office of Conservation and representing the required hearing application fee.

Very truly yours,

Richard W. Revels, Jr.

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RWRjr/dbf Enclosures

cc: Mr. Richard Hudson, Lafayette District of the Office of Conservation

Interested Owners, Represented Parties and Interested Parties

cc:



